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State Ethics Commission

ANNUAL REPORT 1990



STATE OF MARYLAND
EXECUTIVE DEPARTMENT

WILLIAM DONALD SCHAEFER
GOVERNOR

920108



STATE ETHICS COMMISSION

300 E. JOPPA ROAD, SUITE 301
TOWSON, MARYLAND 21204
(301) 321-3636
TDD (301) 333-3098

COMMISSION MEMBERS

WILLIAM J. EVANS, CHAIRMAN
MARK C. MEDAIRDY, JR.
ROBERT C. RICE, Ph.D.
MARY M. THOMPSON

JOHN E. O'DONNELL
EXECUTIVE DIRECTOR
NANCY L. SPECK
GENERAL COUNSEL
ROBERT A. HAHN
STAFF COUNSEL

STATE ETHICS COMMISSION

TWELFTH ANNUAL REPORT

January 1, 1990 - December 31, 1990

NOTE: Reverend C. Anthony Muse was a member of the Commission during part of 1990.

STATE OF MARYLAND

EXECUTIVE DEPARTMENT

WILLIAM DONALD SCHAEFER
GOVERNOR



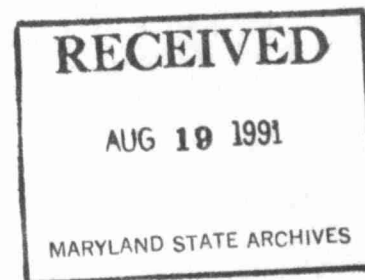
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August 14, 1991

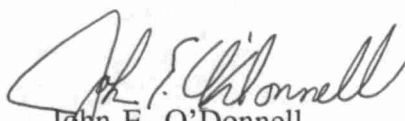
Mr. Edward C. Papenfuse
Maryland State Archives
Hall of Records Commission
350 Rowe Boulevard
Annapolis, MD 21401

Dear Mr. Papenfuse:

Enclosed is the Annual Report of the State Ethics Commission which is required by Law. The report covers Commission activity, lobbyist reporting data, and recommendations for legislation.

If you or your staff need any additional information concerning the report or the ethics program, do not hesitate to call.

Sincerely,


John E. O'Donnell
Executive Director

JEO'D:djb
Enclosure (1)

State Ethics Commission

Twelfth Annual Report

January 1, 1990 - December 31, 1990

GENERAL STATUTORY IMPLEMENTATION

The State Ethics Commission met 9 times during Calendar Year 1990. During the year the Commission was involved in program activity relating to all areas of its statutory mandate. These include financial disclosure, conflict of interest, lobbyist disclosure, local government ethics laws, school board ethics regulations, advisory opinions, enforcement matters and public information activities.

Issuance of Advisory Opinions

The Commission issues advisory opinions in response to requests from officials, employees, lobbyists, and others who are subject to the Law. Additionally, the Commission may issue advisory opinions to other persons at its discretion. During Calendar Year 1990, the Commission received 23 requests for formal advisory opinions and issued 17 formal published opinions. Commission opinions are initially published in the Maryland Register and are compiled and published in Title 19A of the Code of Maryland Regulations. There were 5 requests for advisory opinions pending at the end of the calendar year, and 9 requests were withdrawn. Some of the withdrawn requests were handled by informal letter rather than formal opinion. Most of these opinions dealt primarily with the employment or ownership interest prohibitions under §3-103(a) of the Law. One opinion focused on post-employment issues and one opinion responded to a lobbyist question concerning executive branch lobbying. Two opinions dealt in part with service on private boards. Two opinions discussed participation in State programs by State officials and employees. One opinion covered the activities of the spouse of an employee involving the employee's agency. Other areas of the Law cited in opinions include the non-participation requirements and the prohibition against using position for personal gain. One factor reducing the number of formal opinion requests and opinions issued by the Commission is the large number of existing opinions that can now be used for informal guidance. The Commission staff was able to provide informal guidance in about 485 potential formal request situations based on existing opinions of the Commission. The Commission itself provided informal advice in lieu of formal guidance, usually in the form of a letter, based on past opinions in 79 situations during the year. This informal guidance covered questions or issues arising under all parts of the Ethics Law. Informal advice by the Commission has been used frequently with the need for quick response and the availability of precedents established in formal opinions issued over an eleven year period.

Financial Disclosure

The administration of the financial disclosure program continued to involve the identification of those required to file, providing technical assistance to filers and monitoring compliance with the Law. Compliance review of forms is conducted as part of a phased program for review of the forms of all officials and employees. Currently there are over 6,000 persons filing financial disclosure forms. In addition, copies of all judicial official financial disclosure forms are also filed at the Commission office. As part of the review program, letters are sent to filers

regarding the need to provide further information in order to meet filing requirements. One hundred and seventy-one (171) review letters were sent to regular filers concerning form completion problems during calendar year 1990. In 1990, the Commission also had the responsibility for handling the filing of financial disclosure statements by non-incumbent candidates for State offices. Two hundred and seventy-one (271) of these filings required follow-up correspondence and in most instances forms revision.

Another significant activity in 1990 was implementation of the new law which made higher level contractual employees covered by the financial disclosure and ethics requirements. The Commission coordinated with State agencies and the Secretary of Personnel in implementing this legislation.

In addition to the regular financial disclosure program, a substantial number of gubernatorial appointees to boards or commissions seeking limited conflict of interest exemptions from the appointing authority and from the Senate where confirmation is required, must file a form disclosing areas of existing conflicts with the Commission. The Commission staff coordinated the filing of these forms with the appointing authority and discussed the filing requirements with a large number of appointees throughout the year.

Lobbyist Disclosure and Regulation

During the lobbying year which ended on October 31, 1990, 911 lobbying registrations were filed with the Commission. This represents an increase from the 844 registrations filed in 1989 and the 744 filed in 1988. The 911 registrations were filed by 442 different lobbyists on behalf of 660 separate employers. (Some employers have more than one lobbyist and many lobbyists have more than one employer.) This is an increase from 601 employers having one or more registrants in the previous year. Although the largest number of lobbyists are registered during the legislative session, registrations are beginning and ending throughout the lobbying year, which begins on November 1 and ends on October 31 of the following year. There was actually a reduction in the number of registered lobbyists from 452 in 1989 to 442 in 1990. Although the number of registrations, employers, and the amount of expenditure continues to grow, the number of lobbyists has not grown significantly. This results in a greater concentration of clients fees and expenditures among lobbyists. Most persons registered to lobby have a single registration representing one employer, however, 66 lobbyists had two or more registrations during this time period. Forty-one (41) registrants had four or more employers. Twenty-three (23) lobbyists had eight or more employers.

The \$11,147,442 in lobbying expenditures reported for the period of October 31, 1990, represents an increase of \$512,997 over the previous year. This was the smallest increase in total expenses since 1986. In that year, total expenditures actually decreased. Both of these periods were general election years and the slower rate of spending was probably impacted by less legislative activity particularly during the summer and fall months of election years. Lobbying expenditures have significantly increased since the Commission reported \$2,864,454 of expenditures in 1979, the first year the Ethics Commission administered the filing program. An analysis of individual reports indicates that 47 lobbyist employers reported having total lobbying expenditures of \$50,000 or more. There were 134 lobbyist employers reporting total expenditures of \$25,000 or more. Reports of individual lobbyists registered on behalf of one or more employers indicate that 37 of these persons reported \$50,000 or more in compensation for services. Seventeen (17) lobbyists reported compensation of \$100,000 or more.

Topic areas involving large total employer expenditures during the reporting period included health, utilities, insurance, banking, business, labor, attorneys, and construction. A list of those employers expending \$25,000 or more and those lobbyists reporting \$50,000 or more in compensation is included in the appendices of this report.

The following expenditure data summarizes lobbying expenditures for the last three lobbying years:

	<u>10/31/88</u>	<u>10/31/89</u>	<u>10/31/90</u>
1. Expenditures for meals and beverages for officials or employees or their immediate families.	\$ 326,542	\$ 395,883	\$ 393,927
2. Expenditures for special events, including parties, dinners, athletic events, entertainment, and other functions to which all members of the General Assembly, either house thereof, or any standing committee thereof were invited. (Date, location, group benefited, and total expense for each event are also reported.)	\$ 237,111	\$ 242,871	\$ 229,030
3. Expenses for food, lodging, and scheduled entertainment of officials and employees and spouses for a meeting given in return for participation in a panel or speaking engagement at the meeting.	\$ 12,411	\$ 5,941	\$ 9,020
*4. Expenditures for gifts to or for officials or employees or their immediate families (not including sums reported in 1, 2, and 3).	\$ 131,722	\$ 150,618	\$ 166,299
<u>Subtotal of items 1, 2, 3, & 4</u>	\$ <u>707,786</u>	\$ <u>795,313</u>	\$ <u>798,276</u>
5. Total compensation paid to registrant (not including sums reported in any other section).	\$6,650,424	\$7,804,713	\$8,666,614
6. Salaries, compensation and reimbursed expenses for staff of the registrant.	\$ 632,261	\$ 646,481	\$ 635,346
7. Office expenses not reported in items 5 and 6.	\$ 623,365	\$ 680,135	\$ 442,954

* This category includes the value of race track passes distributed by racing industry lobbyists to State officials. \$71,690 of the \$166,299 reported for gifts in the period ending 10/31/90 reflects value of these passes. In recent years, there has been a substantial decrease in the distribution and acceptance of these passes.

8. Cost of professional and technical research and assistance not reported in items 5 and 6.	\$ 206,268	\$ 216,696	\$ 189,672
9. Cost of publications which expressly encourage persons to communicate with officials or employees.	\$ 392,268	\$ 290,060	\$ 216,926
10. Fees and expenses paid to witnesses.	\$ 9,941	\$ 10,172	\$ 10,619
11. Other expenses.	\$ 183,447	\$ 190,875	\$ 209,035
<u>Total of items 1 through 11</u>	<u>\$9,405,760</u>	<u>\$10,634,445</u>	<u>\$11,147,442</u>

Enforcement Activities

The Ethics Law and implementing rules of the Commission provide that any person may file a complaint with the Commission. Complaints must be signed under oath, and allege a violation of the Law by a person subject to the Law. Additionally, the Commission may file a complaint on its own initiative, and it carries out preliminary inquiries of potential law violations at its discretion.

In Calendar Year 1990 the Commission issued or accepted 55 complaints. Forty-seven (47) complaints involved financial disclosure matters, five complaints involved lobbyist matters and three complaints related to conflict of interest issues. Also, during this year action was completed on 41 complaints. Thirty-eight (38) of these completed complaint cases were financial disclosure matters and three were lobbyist matters. Twenty-three (23) complaints were still active at the end of the Calendar Year. Twenty-nine (29) failure to file timely financial disclosure complaints were terminated by accepting late filing as a cure. Five late financial disclosure filing cases were completed by submission of the form, an admission of late filing violations, waiver of confidentiality, acceptance of a reprimand, and the payment of funds to the State in lieu of a potential fine. Fifteen hundred dollars was collected as a result of this process. The Ethics Law was amended by Senate Bill 149 effective July 1, 1990, to allow the Commission to assess late fees for the late filing of financial disclosure statements. The law now provides the payment of a \$2.00 late fee for each day, not to exceed \$250 in the aggregate if a timely filing violation is found. During 1990, three hearings were held on complaints for failure to timely file financial disclosure statements. All three of the hearings resulted in findings of violations. Two of the hearings, which were after July 1, 1990, resulted in the assessment of late fees.

In regard to conflict of interest enforcement matters, the Circuit Court of Carroll County in 1989 issued a decision upholding four of five violations found by the Commission in the case of State Ethics Commission vs. Wolfing. The case involved financial disclosure matters and post-employment tax appeal work by the former head of the tax assessment office in Baltimore City. Court consideration of fines in 1990, resulted in the assessment of \$2,500 in fines for violation of the employment, post-employment, and financial disclosure provisions of the Ethics Law. At the end of 1990, five complaints were pending involving conflict of interest issues.

Local Government Ethics Laws

Maryland counties and cities are required under Title 6 of the Ethics Law to enact local laws similar to the State law. Criteria for evaluating similarity to the State Law are defined in Commission regulations. Municipalities, based on size and other factors, may be exempted from all or part of the requirement, though an exemption may be granted only in response to a written request.

In addition to the requirement that counties and cities enact ethics laws, the 1983 Session of the General Assembly amended the Law to require local school boards either to promulgate ethics regulations similar to the State Law or be covered by county ethics laws. The Commission issued regulations covering this requirement in 1983. In 1990, the Commission reviewed amendments to local government ethics laws and regulations in seven jurisdictions. Most of the staff activity relating to local ethics programs during 1990 involved providing technical assistance to local ethics officials regarding ongoing administration of local government ethics programs. One significant activity was implementing the change in State law which, as of July 1, placed all local health departments under State Ethics Commission jurisdiction.

Educational and Informational Activities

The Commission staff has been active in providing information to those covered by the Ethics Law, as well as other persons interested in its requirements. A substantial daily staff workload has involved advising employees, officials, candidates and lobbyists on how to complete forms and providing informal advice regarding possible conflicts of interest. The Commission staff has also assisted local government and school board officials in drafting their ethics laws and regulations. The staff has also provided technical advice to many local government ethics boards. Presentations were made by the staff to various groups interested in the operation of the law including special briefings for some state agency groups. These briefings included a presentation to the Governor's Deputy Cabinet, the Baltimore County Community College Presidents, the State Sanitarian Association and Carroll County management employees. A presentation was also made at the annual meeting of the Maryland Municipal League and at the orientation session for new members of the General Assembly.

The annual briefing for lobbyists and those interested in the operations of the lobbying law was held in Annapolis during the 1990 Session of the General Assembly. The Commission has continued to maintain an office in Annapolis during the legislative session in order to provide assistance in the completion of lobbying or financial disclosure forms.

Part of the Commission's public information activity involves distribution of lists of registered lobbyists and provision of assistance to persons inspecting various forms filed with the Commission. Pamphlets describing the Ethics Law have been made available to management level employees in State agencies. Another pamphlet covering ethics requirements for part-time members of State boards and commissions is also being distributed. The Commission has also initiated an Ethics Bulletin which covers prohibitions, rules, procedures and Commission decisions. A special bulletin is sent to lobbyists when changes are made in that program. A Lobbying Law Pamphlet was prepared and distributed in 1990. Fiscal limitations have reduced the ability to develop printed materials and distribute mailed items relating to this part of the Commission program.

LEGISLATIVE RECOMMENDATIONS AND ISSUES

In 1990, the General Assembly passed five bills that responded to legislative recommendations of the Commission. These covered financial disclosure late fees, Ethics Law coverage of higher level contractual employees, lobbyist contribution disclosure, partnership disclosure, and State Ethics Law coverage of local health departments.

The Commission continues to review the adequacy of the Public Ethics Law as required by the statute. The two new recommendations listed below were specifically suggested by the Commission as issues that would be appropriately addressed by legislation in 1991.

1. Court Authority - Ethics Law Enforcement

The State Ethics Law provides for a variety of remedies in situations where the Ethics Commission has determined that a violation of the Law has occurred. One of these remedies includes a provision in Article 40, §7-101(1) allowing a court to void an official action taken by an official or employee with a prohibited conflict when the action arose from or concerned the subject matter of the conflict and if the legal action was brought within 90 days of the occurrence of the official action, if the court deems voiding the action to be in the best interest of the public. In the case of Sugarloaf Citizens Association v. Michael Gudis, the Maryland Court of Appeals ruled that a somewhat similar provision in Montgomery County Ethics Law to be unconstitutional. The main basis for this decision is the court concluded that the Law attempted to vest in the court a non-judicial power. Although it is not completely clear that the decision would apply to void the section of the State Law, the Commission believes this section should be revised to include clearer guidelines to avoid the objections announced by the court in the Gudis decision.

2. Financial Disclosure - Attribution of Blind Trust

The State Ethics Law contains two major prohibitions which impact on the ownership interests of officials and employees. The first prohibition which is contained in Article 40A, §3-101 prohibits an official or employee from participating in any matter in which he has an interest. The main form of ownership interest impacted by §3-101 is holding stock in corporations. The second interest prohibition contained in Article 40A is §3-103(a) which prohibits the holding of interests in certain situations where the entity does business with or is regulated by the employee's or official's agency or an affiliated agency. Both of these sections have exception authority that can be exercised by the State Ethics Commission. This authority has been exercised under §3-103(a) by regulations to some extent and under §3-101 by opinion in one instance as to a non-interest restriction. Generally, issues arise under the two sections in a variety of stock ownership circumstances. Some officials have only a few very small holdings, others have a large holding in one or two companies that may relate to their State position. Others have very substantial holdings in a broad range of companies which could result in economic hardship if sale of these assets were required depending on the facts at the particular time.

The Commission believes that a blind trust program, similar to an existing federal program, could be implemented to apply to the broad stock holding situation. Under this program, the Commission would establish diversified blind trust regulations which would eliminate the application of §3-101 and §3-103(a) to blind trusts established and approved under Commission regulations. These regulations

would be similar to the federal requirements for these types of trusts. In order to take the trust truly blind, legislation would be needed to provide that the holdings in approved blind trusts would not have to be included in the annual financial disclosure statements. The Commission is issuing regulations under Article 40A, §3-101 and §3-103(a) which make exceptions for blind trusts.

The Commission believes a structured blind trust program will accomplish the purposes of the Ethics Law while allowing the State to attract persons to State service who may not otherwise be available or who might be subject to financial hardship in the sales of their holdings. Additionally, this system will provide officials and employees a mechanism that would be available under tightly controlled circumstances to avoid conflicts which might arise unexpectedly regarding their holdings causing unintended violations of the Law or rendering them unable to act on public business.

Other Legislative Recommendations

The recommendations listed below were made in previous Ethics Commission annual reports. The Commission continues to believe that these recommendations are appropriate, based on its experience in administering the ethics program:

- The Law should prohibit participation in matters involving adult children of the official or employee.

- The Law should be formally amended to more specifically reflect advice by the Commission and the Attorney General regarding testimonial fund raising by employees and officials which is fully covered by the Ethics and Elections Law.

- The post-employment provisions should be expanded to prohibit involvement in matters for compensation for one year after leaving State service if that matter was in existence as part of the officials responsibility during his last 12 months of State service.

- There is a need to review whether the requirement that a lobbyist must always be in the physical presence of an official in order to be required to register should be retained in the Law.

- Some consideration should be given to removing the current language dealing with Commission review of forms in §2-103(e), and substituting a provision for review consistent with standards to be established by the Commission.

- There is a need to consider clearly adding former officials and employees to the persons prohibited from using confidential information under §3-107 of the Law.

- There is a need to consider granting the Commission at least minimal fining authority in conflict of interest matters in order to reduce delay and expensive court proceedings.

- The bi-county agency ethics regulations requirements should be reviewed to make sure that sufficient penalty provisions are provided and that the current ethics regulations of the agencies meet the intent of the Law.

- In order to avoid uncertain and confusing application and administration of the Law, the special provisions of §6-202 making members of State boards funded in whole or in part by Baltimore County subject to the county disclosure law instead of

the State law should be considered for elimination or at a minimum copies of these forms should be filed with the State Ethics Commission.

- The current Law does not seem to clearly deal with gifts from foreign governments. There is a need to review the issue and clarify the Law.

- The criteria for financial disclosure by executive and legislative branch officials utilize qualitative considerations in addition to salary. The financial disclosure standards for judicial branch employees utilize only a salary standard. As a result of this standard, certain judicial personnel such as court reporters are included in the filing requirements. The Commission believes the judicial financial disclosure standards should be amended to include qualitative criteria in addition to salary.

- The provisions for confidentiality in the Ethics Law should be reviewed to determine if they adequately protect privacy without denying needed information to operations agencies or the public.

- Consideration should be given to having new officials file a financial disclosure statement covering their holding as of the time when they come into their position rather than for the previous calendar year.

- The Ethics Law prohibits certain types of representation before State agencies. However, except for legislative disclosure under §3-102 of the Ethics Law, there is no required disclosure of representation before State agencies. It is recommended that officials who appear before State agencies for compensation include on their annual disclosure form at a minimum the identity of any agencies involved in this compensated representation.

- The need for disclosure of interest in mutual funds should be reviewed to determine if this information is fully necessary to accomplish the purposes of the Law. The current request of detailing all common stock dividend transactions should also be reviewed.

- The provisions of §4-104(c) regarding attributable interests should be modified to reduce the burden caused by the disclosure requirements when a person has a small share in a large diverse testamentary trust.

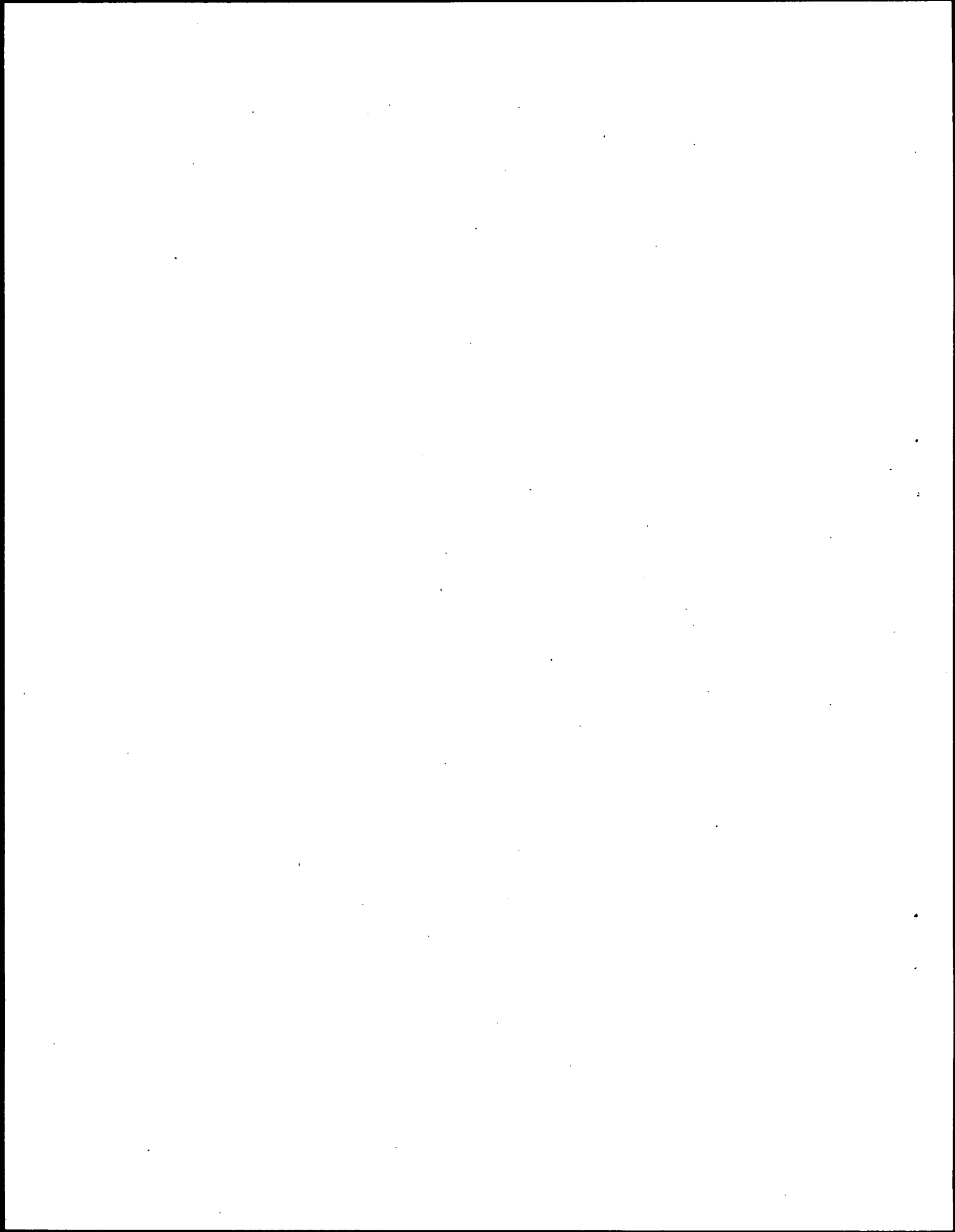
- The provisions covering school board ethics regulations need to be strengthened to assure that there are adequate sanctions for violations by board members, candidates for board membership and lobbyists.

- Judicial candidates should be required to file financial disclosure in each year of their candidacy in the same way as other State officials.

- In election years improperly filed candidate's disclosure forms create unique enforcement problems. Before a violation can be found and made public a variety of confidential administrative and adjudicatory processes have to occur. In most cases this process would extend well beyond the primary election and probably beyond the general election. This means that serious completion problems or even false disclosure could exist unknown to the voting public. A very large percentage of non-incumbent candidates have substantial completion problems. A review should be made by the Executive and the General Assembly to determine whether confidentiality should be eliminated for candidate's financial disclosure enforcement cases at an earlier point in the enforcement process.

- The Ethics Law prohibits employees and non-elected officials from intentionally using their prestige of office for their own private gain or that of another. Elected officials, however, are not covered by this provision. The existing Law be amended to include elected officials or a new provision covering these officials dealing with clear cases of abuse should be specifically added to the Law.

- Issues regarding the spouses of employees or officials have arisen in Maryland and on a national basis. The Maryland Public Ethics Law does not consistently and clearly address these issues or provide sufficient policy guidance in these matters. Spouse ethics issues have become more prevalent in part as a reflection of both spouses having careers and other economic relationships. For example, the Law does not clearly deal with the acceptability of gifts to spouses of officials or employees by prohibited donors. Additionally, the financial disclosure provisions do not clearly address gifts received by the spouse to be disclosed by the employee or official even where such gifts are from donors normally requiring official disclosure. Another significant area needing further clarification is under what circumstances is the ownership interest of a spouse to be attributed to the official or employee for conflict of interest purposes under §3-103(a) of the Ethics Law.



APPENDIX 1

EMPLOYER SPENDING \$25,000 OR MORE - ALL REGISTRANTS - ALL TYPES OF EXPENSES

November 1, 1989 - October 31, 1990

<u>TOTAL AMOUNT</u>	<u>EMPLOYER</u>
1. \$317,256.38	Health Facilities Association of Maryland
2. 232,083.79	Maryland Bankers Association
3. 180,211.72	Maryland Chamber of Commerce
4. 178,945.85	Medical & Chirurgical Faculty of Maryland
5. 141,560.77	Cable TV Assoc. of MD., DEL. & D.C.
6. 136,131.10	C & P Telephone Company of Maryland
7. **124,532.50	Maryland Jockey Club
8. 123,714.60	Maryland Retail Merchants Association
9. 122,165.37	Family Protection Lobby
10. 107,723.54	GTECH Corporation
11. 104,939.88	Maryland State Teachers Association
12. 103,732.93	Maryland Builders Association
13. 93,390.22	Associated Builders and Contractors
14. 91,719.78	Johns Hopkins Health System
15. 88,120.00	Common Cause/Maryland
16. 86,135.16	Chemical Industry Council of Maryland
17. 84,010.95	Maryland Classified Employees Association
18. 83,348.86	Baltimore County, Maryland
19. 82,826.02	Citizens Rights Committee
20. 80,294.96	Potomac Electric Power Company
21. 80,055.13	Medical Mutual Liability Insurance Society of Maryland

** (Includes Race Track Passes of \$71,690.00)

22.	78,592.10	State Farm Insurance
23.	77,161.79	Maryland State Bar Association
24.	71,599.52	Law Offices of Peter G. Angelos
25.	71,075.96	Bethesda Chevy Chase Chamber of Commerce
26.	69,565.00	Maryland Citizen Action Coalition
27.	68,427.56	Crown Central Petroleum
28.	67,721.12	Tobacco Institute
29.	67,631.58	Baltimore Gas & Electric Company
30.	67,559.56	National Federation of Independent Businesses
31.	66,864.56	Citibank (MD), N.A. T/A Choice
32.	65,643.16	Maryland State Dental Association
33.	63,491.56	Maryland State & D.C. AFL-CIO
34.	61,464.11	Apartment & Office Building Association
35.	60,953.00	Control Data
36.	59,273.48	First National Bank of Maryland
37.	57,895.00	Household International
38.	57,100.00	Marine Trades Association of Maryland
39.	56,625.00	Committee for Fair Statues of Repose in Md.
40.	56,403.01	ATANCA (Automotive Trade Association of the National Capital Area)
41.	56,289.87	Maryland Trial Lawyers Association
42.	55,573.04	Coalition for Clarification of Section 5-108 of the Court's Article
43.	54,353.00	Maryland Hospital Association
44.	51,969.66	Health Insurance Association of America
45.	51,610.36	American Insurance Association
46.	50,917.66	Suburban Maryland Building Industry Assn.
47.	50,700.00	IBM Corporation

48.	49,984.93	Association of Maryland Pilots
49.	49,780.03	Maryland Psychological Association
50.	48,322.94	Industry Council for Tangible Assets
51.	48,072.92	National Solid Waste Management Assn.
52.	46,789.46	Maryland Medical Laboratory, Inc.
53.	46,018.00	Planned Parenthood of Maryland
54.	45,657.19	Maryland New Car and Truck Dealers Assn.
55.	45,542.55	Bethlehem Steel Corporation
56.	45,449.65	CSX Transportation
57.	45,252.78	Genstar Stone Products Company
58.	45,108.05	Maryland Association of Realtors
59.	44,563.73	Chesapeake Bay Foundation
60.	44,289.77	Maryland Association of Chain Drug Stores
61.	44,134.26	UNISYS Corporation
62.	43,295.35	Maryland Farm Bureau, Inc.
63.	43,001.36	MED Mutual
64.	42,660.75	League of Life & Health Insurers of Md., Inc.
65.	42,390.68	Marylander's for the Right to Choose
66.	41,557.00	Blue Cross & Blue Shield
67.	41,421.18	Group Hospitalization & Medical Services
68.	41,266.47	Potomac Edison Co., Inc.
69.	41,227.64	P.I.E. Mutual Insurance Company
70.	41,147.50	Maryland Security Industries
71.	40,496.86	R. J. Reynolds Tobacco Company
72.	40,444.45	National Association of Independent Insurers
73.	40,357.83	Chambers Development Co., Inc.
74.	40,175.00	Giant Food, Inc.

75.	40,137.00	MD NARAL - MD. Affiliate of the National Abortion Rights Action League
76.	40,007.38	Variable Annuity Life Insurance
77.	40,000.00	Melwood Horticultural Training Center, Inc.
78.	39,917.98	Mid-Atlantic Petroleum Distributors Assn.
79.	39,652.21	Maryland Natural Gas
80.	39,235.00	Maryland Independent College and University Association
81.	39,221.45	Enviro-Gro Technologies
82.	38,812.13	Maryland Association of Mutual Insurance Companies (MAMIC)
83.	38,760.79	National Association of Industrial & Office Parks, Md.
84.	38,704.74	Maryland Land Title Association
85.	38,395.87	Healthplus
86.	38,143.64	G. D. Searle & Company
87.	38,082.10	American Petroleum Institute
88.	36,911.74	Montgomery County Assn. of Realtors
89.	36,820.42	Maryland Saltwater Sportfisherman's Assn.
90.	36,310.33	Associated Utility Contractors of Md., Inc.
91.	36,288.48	Connecticut General Life Insurance Company
92.	36,000.00	American Council of Life Insurance
93.	35,910.00	Anne Arundel General Health Care Systems, Inc.
94.	35,895.85	Maryland Catholic Conference
95.	35,432.84	FMC Agricultural Chemicals
96.	35,395.31	ROC-Vantage Associates
97.	35,378.51	Maryland Association of Boards of Education
98.	35,112.70	Pharmaceutical Manufacturers Association
99.	35,000.00	Eastern Shore of Md. Education Consortium

100.	34,856.76	Nationwide Insurance Company
101.	34,450.00	Associated Catholic Charities
102.	34,291.72	Citicorp
103.	34,161.70	Johns Hopkins University
104.	34,132.49	The Ryland Group
105.	33,740.57	Maryland Optometric Association
106.	33,132.97	Wheat, First Securities, Inc.
107.	32,419.70	Columbia Country Club
108.	31,674.61	Philip Morris, U.S.A.
109.	31,411.00	Maryland Troopers Association, Inc.
110.	31,115.95	Howard Research & Development Corp., The
111.	30,788.23	A T & T
112.	30,314.55	Multi-State Associates on behalf of Hi-Tek Community Control
113.	30,049.17	Maryland Society of the American Institute of Architects, Inc.
114.	30,033.65	Baltimore Bank Corporation
115.	30,000.00	Prince George's County Government
116.	29,221.87	Marriott Corporation
117.	29,127.96	Federation of Maryland Teachers
118.	28,854.16	STV/Lyon Associates
119.	28,394.00	AFSCME Council 92
120.	28,291.22	Maryland Motor Truck Association, Inc.
121.	28,185.00	Maryland Food Committee
122.	28,125.00	James T. Lewis Enterprises, Ltd.
123.	28,013.50	Scientific Games, Inc.
124.	28,000.00	Maryland Insurance Council
125.	27,879.47	American Family Life Assurance Company

126.	27,443.50	Professional Insurance Agents of PA., MD., & DEL, Inc.
127.	26,960.93	Maryland Coalition of Interior Designers
128.	26,790.39	American Subcontractors Association of Baltimore, Inc.
129.	26,448.80	Chase Manhattan Bank, N.A.
130.	26,365.13	McNeil Pharmaceuticals
131.	26,201.70	Maryland Association of Health Maintenance Organizations
132.	25,837.49	Maryland REA, Inc.
133.	25,719.00	DEL/MD Synod, Evangelical Lutheran Church
134.	25,354.78	Maryland Highway Contractors Association

APPENDIX 2

LOBBYISTS RECEIVING \$50,000 OR MORE IN COMPENSATION - ALL CLIENTS

November 1, 1989 - October 31, 1990

1.	\$761,802.50	Bereano, Bruce, C.
2.	512,117.50	Rifkin, Alan, M.
3.	392,905.77	Goldstein, Franklin
4.	380,664.17	Cooke, Ira, C.
5.	271,552.63	Doyle, James, J., Jr.
6.	268,523.29	Schwartz, Joseph, A. III
7.	243,000.00	Evans, Gerard, E.
8.	228,746.00	Pitcher, J. William
9.	185,787.74	McCoy, Dennis, C.
10.	158,860.00	Manis, George, N.
11.	143,419.72	Neil, John, B.
12.	127,484.54	Doherty, Daniel, T.
13.	125,354.85	Goeden, James, P.
14.	125,350.00	Burridge, Carolyn, T.
15.	116,206.50	Doolan, Devin John
16.	114,849.71	Enten, D. Robert
17.	104,684.50	Barbera, Thomas, P.
18.	96,037.00	Adler, Maxine
19.	95,235.00	Neily, Alice, J.
20.	89,132.50	Silver, Edgar, P.
21.	85,000.00	O'Dell, Wayne
22.	83,204.68	Rummage, Frederick, C.
23.	80,172.50	Shaivitz, Robin, F.

24.	73,000.00	Canning, Michael, F.
25.	68,330.41	McDonough, John, P.
26.	66,094.00	Chew, Fred, D.
27.	61,869.74	Redden, Roger, D.
28.	60,000.00	Lamone, Linda, H.
29.	58,801.32	Epstein, Harvey, A.
30.	58,276.00	Miller, Herman, B.
31.	56,323.09	Winchester, Albert III
32.	55,000.00	Blackistone, Morris
33.	54,993.28	Batoff, Steve, I.
34.	51,723.39	Steward, William, R.
35.	50,867.16	Ryan, Charles
36.	50,750.00	Popham, Bryson, F.
37.	50,133.27	Bowers, John, B. Jr.

